

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JULIAN SANCTON, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendant.

ECF CASE

No. 1:23-cv-10211

**DECLARATION IN SUPPORT OF  
MOTION FOR ADMISSION OF  
ATTORNEY PRO HAC VICE**

Justin A. Nelson, declares:

1. I am a Partner with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the Supreme Court of Texas.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. My attorney registration number for the State Bar of Texas is 24034766.

8. Wherefore, your declarant respectively submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-10211 for Plaintiff (Julian Sancton) and the Proposed Class.

I, Justin A. Nelson, declare under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2023

Respectfully submitted,

/s/ Justin A. Nelson

Justin A. Nelson  
TX State Bar No. 24034766  
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*Attorney for Plaintiff and the Proposed Class*